

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

FREMONT REORGANIZING  
CORPORATION,

Plaintiff,

vs

Case No. 2:10-cv-11923

Hon. DAVID M. LAWSON

ANSWER TO COMPLAINT

RONNIE DUKE, RYAN ZUNDEL, BILL WELLS,  
WILLINEVAH RICHARDSON, ANTHONY PETERS,  
BRYAN STURGEON, AMERICAN NATIONWIDE MORTGAGE  
COMPANY, APEX FINANCIAL GROUP, INC., d/b/a  
AAPEX MORTGAGE CORPORATION, CBB, INC., d/b/a  
BRET LIN HOME MORTGAGE, FIRST ESCROW COMPANY,  
LLC, HARDCORE MOTOR SPORTS, LLC, HARDCORE  
RACING, INC., JS REALTY LLC, LAWYERS ESCROW  
COMPANY, LIBERTY TITLE AND ESCROW SERVICES LLC,  
MOTOR CITY FINANCIAL SERVICES, NATIONS TITLE OF  
OHIO, NORTH AMERICAN HOME FUNDING, INC., OWNER  
REALTY.COM, PREMIER MORTGAGE FUNDING, INC.,  
QUOTEMEAREATE.COM, INC., REAL ESTATE ONE, INC.,  
SPECIALTY HOLDINGS, INC., ANDREW AUTY, TIMOTHY  
BAKER, MELISSA BASTIEN, HUSSEIN ABDUL-MAJID BAZZI  
a/k/a SAM BAZZI, ALI BAYDOUN, JAY BAYDOUN a/k/a  
JALAL BOYDOUIN, CHEA BENNETT, MORGAN BEVENSEE,  
KEVIN BOS, LISA BOS, ROBERT BRIERLEY, BYRON DEES,  
FRANK GENDERNALIK, SUSAN GENDERNALIK, RAY HALL,  
HUGH BRADLEY JAMES, KIM KENT, DAVID LARA, HAROLD  
LARSEN, DANNY LEY, PATRICK LLOYD, JOSE MARTINEZ,  
JOHN MAYER, KATHY MCCUTCHEON a/k/a KATHY SIZEMORE,  
APRIL MILLER, COLLETTE MILLITELLO, JOSEPH MILLTELLO,  
PAUL MORRIS, ADELBERT MOSS, BRYAN MURPHY, DANIELLE NAPPER,  
SUZANNE NICHOLAS, DANIEL PANKO, KATHLEEN POUNDS, LARRY  
RIDEOUT, RICARDO RODRIGUEZ, FRANK RAY SCHAFER, JR., JEFF  
SCHUCK, RACHEL SEMAN, MICHAEL SHILAKES, JAMIE SWEENEY,  
RONALD TALASKI, JR., MITCHELL TOMCSIK, NICOLE TURCHECK,  
ROBERT TURCHECK, LINDA WAHLER, DONNA WALBROOK, PAUL  
WHITESIDE, JEREMY YALKIN, KASSEM ZREIK, and FIDELITY  
NATIONAL TITLE INSURANCE COMPANY,

Defendants.

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**MICHAEL C. O'MALLEY (P59108)**  
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(916)677-4254  
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Attorneys for Plaintiff

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**DEFENDANT JOHN P. MAYER, JR.'s ANSWER TO COMPLAINT**

NOW COMES Defendant, **JOHN P. MAYER, JR.**, by and through his attorneys, **REGNIER & ASSOCIATES, PLC**, and in answer to Plaintiff's Complaint, states onto this Honorable Court as follows:

1. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one of the Complaint and therefore leaves Plaintiff to its proofs.

2. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two of the Complaint and therefore leaves Plaintiff to its proofs.

3. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three of the Complaint and therefore leaves Plaintiff to its proofs.

4. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four of the Complaint and therefore leaves Plaintiff to its proofs.

5. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph five of the Complaint and therefore leaves Plaintiff to its proofs.

6. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph six of the Complaint and therefore leaves Plaintiff to its proofs.

7. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seven of the Complaint and therefore leaves Plaintiff to its proofs.

8. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eight of the Complaint and therefore leaves Plaintiff to its proofs.

9. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph nine of the Complaint and therefore leaves Plaintiff to its proofs.

10. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ten of the Complaint and therefore leaves Plaintiff to its proofs.

11. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eleven of the Complaint and therefore leaves Plaintiff to its proofs.

12. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twelve of the Complaint and therefore leaves Plaintiff to its proofs.

13. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirteen of the Complaint and therefore leaves Plaintiff to its proofs.

14. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fourteen of the Complaint and therefore leaves Plaintiff to its proofs.

15. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifteen of the Complaint and therefore leaves Plaintiff to its proofs.

16. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixteen of the Complaint and therefore leaves Plaintiff to its proofs.

17. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventeen of the Complaint and therefore leaves Plaintiff to its proofs.

18. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighteen of the Complaint and therefore leaves Plaintiff to its proofs.

19. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph nineteen of the Complaint and therefore leaves Plaintiff to its proofs.

20. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty of the Complaint and therefore leaves Plaintiff to its proofs.

21. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-one of the Complaint and therefore leaves Plaintiff to its proofs.

22. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-two of the Complaint and therefore leaves Plaintiff to its proofs.

23. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-three of the Complaint and therefore leaves Plaintiff to its proofs.

24. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-four of the Complaint and therefore leaves Plaintiff to its proofs.

25. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-five of the Complaint and therefore leaves Plaintiff to its proofs.

26. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-six of the Complaint and therefore leaves Plaintiff to its proofs.

27. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

28. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

29. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph twenty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

30. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty of the Complaint and therefore leaves Plaintiff to its proofs.

31. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-one of the Complaint and therefore leaves Plaintiff to its proofs.

32. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-two of the Complaint and therefore leaves Plaintiff to its proofs.

33. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-three of the Complaint and therefore leaves Plaintiff to its proofs.

34. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-four of the Complaint and therefore leaves Plaintiff to its proofs.

35. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-five of the Complaint and therefore leaves Plaintiff to its proofs.

36. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-six of the Complaint and therefore leaves Plaintiff to its proofs.

37. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

38. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph thirty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

39. Admitted as to Defendant's citizenship, but in all other respects the allegation is denied.

40. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty of the Complaint and therefore leaves Plaintiff to its proofs.

41. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-one of the Complaint and therefore leaves Plaintiff to its proofs.

42. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-two of the Complaint and therefore leaves Plaintiff to its proofs.

43. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-three of the Complaint and therefore leaves Plaintiff to its proofs.

44. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-four of the Complaint and therefore leaves Plaintiff to its proofs.

45. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-five of the Complaint and therefore leaves Plaintiff to its proofs.



46. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-six of the Complaint and therefore leaves Plaintiff to its proofs.

47. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

48. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

49. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph forty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

50. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty of the Complaint and therefore leaves Plaintiff to its proofs.

51. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-one of the Complaint and therefore leaves Plaintiff to its proofs.

52. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-two of the Complaint and therefore leaves Plaintiff to its proofs.

53. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-three of the Complaint and therefore leaves Plaintiff to its proofs.

54. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-four of the Complaint and therefore leaves Plaintiff to its proofs.

55. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-five of the Complaint and therefore leaves Plaintiff to its proofs.

56. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-six of the Complaint and therefore leaves Plaintiff to its proofs.

57. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

58. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

59. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph fifty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

60. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty of the Complaint and therefore leaves Plaintiff to its proofs.

61. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-one of the Complaint and therefore leaves Plaintiff to its proofs.

62. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-two of the Complaint and therefore leaves Plaintiff to its proofs.

63. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-three of the Complaint and therefore leaves Plaintiff to its proofs.

64. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-four of the Complaint and therefore leaves Plaintiff to its proofs.

65. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-

five of the Complaint and therefore leaves Plaintiff to its proofs.

66. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-six of the Complaint and therefore leaves Plaintiff to its proofs.

67. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Jurisdiction and Venue**

68. Admit.

69. Admit.

70. Admit.

#### **General Factual Allegations**

71. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-one of the Complaint and therefore leaves Plaintiff to its proofs.

72. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-two of the Complaint and therefore leaves Plaintiff to its proofs.

73. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-

three of the Complaint and therefore leaves Plaintiff to its proofs.

74. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-four of the Complaint and therefore leaves Plaintiff to its proofs.

75. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-five of the Complaint and therefore leaves Plaintiff to its proofs.

76. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-six of the Complaint and therefore leaves Plaintiff to its proofs.

77. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-seven of the Complaint and therefore leaves Plaintiff to its proofs.

78. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-eight of the Complaint and therefore leaves Plaintiff to its proofs.

79. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph seventy-

nine of the Complaint and therefore leaves Plaintiff to its proofs.

80. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty of the Complaint and therefore leaves Plaintiff to its proofs.

81. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-one of the Complaint and therefore leaves Plaintiff to its proofs.

82. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-two of the Complaint and therefore leaves Plaintiff to its proofs.

83. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-three of the Complaint and therefore leaves Plaintiff to its proofs.

84. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-four of the Complaint and therefore leaves Plaintiff to its proofs.

85. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-

five of the Complaint and therefore leaves Plaintiff to its proofs.

86. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-six of the Complaint and therefore leaves Plaintiff to its proofs.

87. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

88. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

89. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph eighty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

90. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety of the Complaint and therefore leaves Plaintiff to its proofs.

91. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-

one of the Complaint and therefore leaves Plaintiff to its proofs.

92. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-two of the Complaint and therefore leaves Plaintiff to its proofs.

93. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-three of the Complaint and therefore leaves Plaintiff to its proofs.

94. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-four of the Complaint and therefore leaves Plaintiff to its proofs.

95. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-five of the Complaint and therefore leaves Plaintiff to its proofs.

96. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-six of the Complaint and therefore leaves Plaintiff to its proofs.

97. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-



seven of the Complaint and therefore leaves Plaintiff to its proofs.

98. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-eight of the Complaint and therefore leaves Plaintiff to its proofs.

99. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph ninety-nine of the Complaint and therefore leaves Plaintiff to its proofs.

100. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred of the Complaint and therefore leaves Plaintiff to its proofs.

101. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred one of the Complaint and therefore leaves Plaintiff to its proofs.

102. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred two of the Complaint and therefore leaves Plaintiff to its proofs.

103. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred three of the Complaint and therefore leaves Plaintiff to its proofs.

104. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred four of the Complaint and therefore leaves Plaintiff to its proofs.

105. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred five of the Complaint and therefore leaves Plaintiff to its proofs.

106. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph sixty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

107. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seven of the Complaint and therefore leaves Plaintiff to its proofs.

108. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eight of the Complaint and therefore leaves Plaintiff to its proofs.

109. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred nine of the Complaint and therefore leaves Plaintiff to its proofs.

**RICO Predicate Act Allegations**

110. Admit.

111. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eleven of the Complaint and therefore leaves Plaintiff to its proofs.

112. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twelve of the Complaint and therefore leaves Plaintiff to its proofs.

113. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirteen of the Complaint and therefore leaves Plaintiff to its proofs.

114. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fourteen of the Complaint and therefore leaves Plaintiff to its proofs.

115. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifteen of the Complaint and therefore leaves Plaintiff to its proofs.

116. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixteen of the Complaint and therefore leaves Plaintiff to its proofs.

117. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventeen of the Complaint and therefore leaves Plaintiff to its proofs.

118. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighteen of the Complaint and therefore leaves Plaintiff to its proofs.

119. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred nineteen of the Complaint and therefore leaves Plaintiff to its proofs.

120. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty of the Complaint and therefore leaves Plaintiff to its proofs.

### **Count I**

121. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred twenty-one of the Complaint and therefore leaves Plaintiff to its proofs.

122. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-two of the Complaint and therefore leaves Plaintiff to its proofs.

123. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-three of the Complaint and therefore leaves Plaintiff to its proofs.

124. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-four of the Complaint and therefore leaves Plaintiff to its proofs.

125. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-five of the Complaint and therefore leaves Plaintiff to its proofs.

126. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-six of the Complaint and therefore leaves Plaintiff to its proofs.

127. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred twenty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

128. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

129. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred twenty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

130. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty of the Complaint and therefore leaves Plaintiff to its proofs.

131. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-one of the Complaint and therefore leaves Plaintiff to its proofs.

132. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-two of the Complaint and therefore leaves Plaintiff to its proofs.

133. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred thirty-three of the Complaint and therefore leaves Plaintiff to its proofs.

134. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-four of the Complaint and therefore leaves Plaintiff to its proofs.

135. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-five of the Complaint and therefore leaves Plaintiff to its proofs.

136. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-six of the Complaint and therefore leaves Plaintiff to its proofs.

137. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

138. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred thirty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

139. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred thirty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

140. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty of the Complaint and therefore leaves Plaintiff to its proofs.

141. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-one of the Complaint and therefore leaves Plaintiff to its proofs.

142. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-two of the Complaint and therefore leaves Plaintiff to its proofs.

143. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-three of the Complaint and therefore leaves Plaintiff to its proofs.

144. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-four of the Complaint and therefore leaves Plaintiff to its proofs.

145. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one



hundred forty-five of the Complaint and therefore leaves Plaintiff to its proofs.

146. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-six of the Complaint and therefore leaves Plaintiff to its proofs.

147. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

148. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

149. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred forty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

150. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty of the Complaint and therefore leaves Plaintiff to its proofs.

151. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred fifty-one of the Complaint and therefore leaves Plaintiff to its proofs.

152. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-two of the Complaint and therefore leaves Plaintiff to its proofs.

153. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-three of the Complaint and therefore leaves Plaintiff to its proofs.

154. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-four of the Complaint and therefore leaves Plaintiff to its proofs.

155. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-five of the Complaint and therefore leaves Plaintiff to its proofs.

156. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-six of the Complaint and therefore leaves Plaintiff to its proofs.

157. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred fifty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

158. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

159. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred fifty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

160. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty of the Complaint and therefore leaves Plaintiff to its proofs.

161. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-one of the Complaint and therefore leaves Plaintiff to its proofs.

162. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-two of the Complaint and therefore leaves Plaintiff to its proofs.

163. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one

hundred sixty-three of the Complaint and therefore leaves Plaintiff to its proofs.

164. Denied.

165. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-five of the Complaint and therefore leaves Plaintiff to its proofs.

166. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-six of the Complaint and therefore leaves Plaintiff to its proofs.

167. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

168. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

169. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred sixty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

170. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy of the Complaint and therefore leaves Plaintiff to its proofs.

171. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-one of the Complaint and therefore leaves Plaintiff to its proofs.

172. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-two of the Complaint and therefore leaves Plaintiff to its proofs.

173. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-three of the Complaint and therefore leaves Plaintiff to its proofs.

174. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-four of the Complaint and therefore leaves Plaintiff to its proofs.

175. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-five of the Complaint and therefore leaves Plaintiff to its proofs.

176. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-six of the Complaint and therefore leaves Plaintiff to its proofs.

177. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-seven of the Complaint and therefore leaves Plaintiff to its proofs.

178. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-eight of the Complaint and therefore leaves Plaintiff to its proofs.

179. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred seventy-nine of the Complaint and therefore leaves Plaintiff to its proofs.

180. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty of the Complaint and therefore leaves Plaintiff to its proofs.

181. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-one of the Complaint and therefore leaves Plaintiff to its proofs.

182. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-two of the Complaint and therefore leaves Plaintiff to its proofs.

183. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-three of the Complaint and therefore leaves Plaintiff to its proofs.

184. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-four of the Complaint and therefore leaves Plaintiff to its proofs.

185. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-five of the Complaint and therefore leaves Plaintiff to its proofs.

186. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-six of the Complaint and therefore leaves Plaintiff to its proofs.

187. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

188. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

189. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred eighty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

190. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety of the Complaint and therefore leaves Plaintiff to its proofs.

191. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-one of the Complaint and therefore leaves Plaintiff to its proofs.

192. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-two of the Complaint and therefore leaves Plaintiff to its proofs.

193. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-three of the Complaint and therefore leaves Plaintiff to its proofs.



194. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-four of the Complaint and therefore leaves Plaintiff to its proofs.

195. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-five of the Complaint and therefore leaves Plaintiff to its proofs.

196. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-six of the Complaint and therefore leaves Plaintiff to its proofs.

197. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-seven of the Complaint and therefore leaves Plaintiff to its proofs.

198. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-eight of the Complaint and therefore leaves Plaintiff to its proofs.

199. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph one hundred ninety-nine of the Complaint and therefore leaves Plaintiff to its proofs.

200. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred of the Complaint and therefore leaves Plaintiff to its proofs.

**Violations of 18 U.S.C. § 1962(d)**

201. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred one of the Complaint and therefore leaves Plaintiff to its proofs.

202. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred two of the Complaint and therefore leaves Plaintiff to its proofs.

203. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred three of the Complaint and therefore leaves Plaintiff to its proofs.

204. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred four of the Complaint and therefore leaves Plaintiff to its proofs.

205. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred five of the Complaint and therefore leaves Plaintiff to its proofs.

206. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred six of the Complaint and therefore leaves Plaintiff to its proofs.

207. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seven of the Complaint and therefore leaves Plaintiff to its proofs.

208. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eight of the Complaint and therefore leaves Plaintiff to its proofs.

209. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred nine of the Complaint and therefore leaves Plaintiff to its proofs.

210. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ten of the Complaint and therefore leaves Plaintiff to its proofs.

211. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred eleven of the Complaint and therefore leaves Plaintiff to its proofs.

**Violations of 18 U.S.C. § 1962(a)**

212. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twelve of the Complaint and therefore leaves Plaintiff to its proofs.

213. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirteen of the Complaint and therefore leaves Plaintiff to its proofs.

214. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fourteen of the Complaint and therefore leaves Plaintiff to its proofs.

215. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifteen of the Complaint and therefore leaves Plaintiff to its proofs.

216. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixteen of the Complaint and therefore leaves Plaintiff to its proofs.

217. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventeen of the Complaint and therefore leaves Plaintiff to its proofs.

218. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighteen of the Complaint and therefore leaves Plaintiff to its proofs.

219. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred nineteen of the Complaint and therefore leaves Plaintiff to its proofs.

220. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Common Law Fraud**

221. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-one of the Complaint and therefore leaves Plaintiff to its proofs.

222. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred twenty-two of the Complaint and therefore leaves Plaintiff to its proofs.

223. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-three of the Complaint and therefore leaves Plaintiff to its proofs.

**Civil Conspiracy**

224. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-four of the Complaint and therefore leaves Plaintiff to its proofs.

225. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-five of the Complaint and therefore leaves Plaintiff to its proofs.

226. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-six of the Complaint and therefore leaves Plaintiff to its proofs.

**Aiding and Abetting Fraud**

227. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

228. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

229. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred twenty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

230. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty of the Complaint and therefore leaves Plaintiff to its proofs.

## **Count II**

231. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-one of the Complaint and therefore leaves Plaintiff to its proofs.

232. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-two of the Complaint and therefore leaves Plaintiff to its proofs.

233. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred thirty-three of the Complaint and therefore leaves Plaintiff to its proofs.

**Count III**

234. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-four of the Complaint and therefore leaves Plaintiff to its proofs.

235. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-five of the Complaint and therefore leaves Plaintiff to its proofs.

236. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-six of the Complaint and therefore leaves Plaintiff to its proofs.

**Count IV**

237. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

238. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-eight of the Complaint and therefore leaves Plaintiff to its proofs.



239. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred thirty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

240. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty of the Complaint and therefore leaves Plaintiff to its proofs.

241. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-one of the Complaint and therefore leaves Plaintiff to its proofs.

242. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-two of the Complaint and therefore leaves Plaintiff to its proofs.

243. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-three of the Complaint and therefore leaves Plaintiff to its proofs.

244. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-four of the Complaint and therefore leaves Plaintiff to its proofs.

245. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-five of the Complaint and therefore leaves Plaintiff to its proofs.

246. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-six of the Complaint and therefore leaves Plaintiff to its proofs.

247. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

248. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

249. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred forty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

250. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty of the Complaint and therefore leaves Plaintiff to its proofs.

251. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-one of the Complaint and therefore leaves Plaintiff to its proofs.

252. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-two of the Complaint and therefore leaves Plaintiff to its proofs.

253. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-three of the Complaint and therefore leaves Plaintiff to its proofs.

254. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-four of the Complaint and therefore leaves Plaintiff to its proofs.

255. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-five of the Complaint and therefore leaves Plaintiff to its proofs.

256. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-six of the Complaint and therefore leaves Plaintiff to its proofs.

257. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

258. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

259. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred fifty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

260. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Count V**

261. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-one of the Complaint and therefore leaves Plaintiff to its proofs.

262. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred sixty-two of the Complaint and therefore leaves Plaintiff to its proofs.

263. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-three of the Complaint and therefore leaves Plaintiff to its proofs.

264. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-four of the Complaint and therefore leaves Plaintiff to its proofs.

265. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-five of the Complaint and therefore leaves Plaintiff to its proofs.

266. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-six of the Complaint and therefore leaves Plaintiff to its proofs.

267. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

268. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred sixty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

269. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred sixty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

270. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy of the Complaint and therefore leaves Plaintiff to its proofs.

271. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-one of the Complaint and therefore leaves Plaintiff to its proofs.

272. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-two of the Complaint and therefore leaves Plaintiff to its proofs.

273. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-three of the Complaint and therefore leaves Plaintiff to its proofs.

274. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred seventy-four of the Complaint and therefore leaves Plaintiff to its proofs.

275. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-five of the Complaint and therefore leaves Plaintiff to its proofs.

276. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-six of the Complaint and therefore leaves Plaintiff to its proofs.

277. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-seven of the Complaint and therefore leaves Plaintiff to its proofs.

278. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-eight of the Complaint and therefore leaves Plaintiff to its proofs.

279. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred seventy-nine of the Complaint and therefore leaves Plaintiff to its proofs.

280. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two

hundred eighty of the Complaint and therefore leaves Plaintiff to its proofs.

281. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-one of the Complaint and therefore leaves Plaintiff to its proofs.

282. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-two of the Complaint and therefore leaves Plaintiff to its proofs.

283. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-three of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Count VI**

284. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-four of the Complaint and therefore leaves Plaintiff to its proofs.

285. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-five of the Complaint and therefore leaves Plaintiff to its proofs.



286. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-six of the Complaint and therefore leaves Plaintiff to its proofs.

287. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

288. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

289. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred eighty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

290. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety of the Complaint and therefore leaves Plaintiff to its proofs.

291. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-one of the Complaint and therefore leaves Plaintiff to its proofs.

292. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-two of the Complaint and therefore leaves Plaintiff to its proofs.

293. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-three of the Complaint and therefore leaves Plaintiff to its proofs.

294. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-four of the Complaint and therefore leaves Plaintiff to its proofs.

295. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-five of the Complaint and therefore leaves Plaintiff to its proofs.

296. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-six of the Complaint and therefore leaves Plaintiff to its proofs.

297. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-seven of the Complaint and therefore leaves Plaintiff to its proofs.

298. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-eight of the Complaint and therefore leaves Plaintiff to its proofs.

299. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph two hundred ninety-nine of the Complaint and therefore leaves Plaintiff to its proofs.

300. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred of the Complaint and therefore leaves Plaintiff to its proofs.

301. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-one of the Complaint and therefore leaves Plaintiff to its proofs.

302. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-two of the Complaint and therefore leaves Plaintiff to its proofs.

303. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-three of the Complaint and therefore leaves Plaintiff to its proofs.

304. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-four of the Complaint and therefore leaves Plaintiff to its proofs.

305. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-five of the Complaint and therefore leaves Plaintiff to its proofs.

306. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-six of the Complaint and therefore leaves Plaintiff to its proofs.

307. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-seven of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Count VII**

308. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred-eight of the Complaint and therefore leaves Plaintiff to its proofs.

309. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred-nine of the Complaint and therefore leaves Plaintiff to its proofs.

310. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ten of the Complaint and therefore leaves Plaintiff to its proofs.

311. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eleven of the Complaint and therefore leaves Plaintiff to its proofs.

312. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twelve of the Complaint and therefore leaves Plaintiff to its proofs.

313. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirteen of the Complaint and therefore leaves Plaintiff to its proofs.

314. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fourteen of the Complaint and therefore leaves Plaintiff to its proofs.

315. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred fifteen of the Complaint and therefore leaves Plaintiff to its proofs.

316. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixteen of the Complaint and therefore leaves Plaintiff to its proofs.

317. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventeen of the Complaint and therefore leaves Plaintiff to its proofs.

318. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighteen of the Complaint and therefore leaves Plaintiff to its proofs.

319. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred nineteen of the Complaint and therefore leaves Plaintiff to its proofs.

320. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty of the Complaint and therefore leaves Plaintiff to its proofs.

321. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred twenty-one of the Complaint and therefore leaves Plaintiff to its proofs.

322. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-two of the Complaint and therefore leaves Plaintiff to its proofs.

323. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-three of the Complaint and therefore leaves Plaintiff to its proofs.

324. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-four of the Complaint and therefore leaves Plaintiff to its proofs.

325. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-five of the Complaint and therefore leaves Plaintiff to its proofs.

326. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-six of the Complaint and therefore leaves Plaintiff to its proofs.

327. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred twenty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

328. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

329. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred twenty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

330. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty of the Complaint and therefore leaves Plaintiff to its proofs.

331. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-one of the Complaint and therefore leaves Plaintiff to its proofs.

#### **Count VIII**

332. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-two of the Complaint and therefore leaves Plaintiff to its proofs.



333. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-three of the Complaint and therefore leaves Plaintiff to its proofs.

334. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-four of the Complaint and therefore leaves Plaintiff to its proofs.

335. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-five of the Complaint and therefore leaves Plaintiff to its proofs.

336. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-six of the Complaint and therefore leaves Plaintiff to its proofs.

337. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-seventy of the Complaint and therefore leaves Plaintiff to its proofs.

338. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

339. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred thirty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

340. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty of the Complaint and therefore leaves Plaintiff to its proofs.

341. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-one of the Complaint and therefore leaves Plaintiff to its proofs.

342. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-two of the Complaint and therefore leaves Plaintiff to its proofs.

343. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-three of the Complaint and therefore leaves Plaintiff to its proofs.

344. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-four of the Complaint and therefore leaves Plaintiff to its proofs.

345. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-five of the Complaint and therefore leaves Plaintiff to its proofs.

346. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-six of the Complaint and therefore leaves Plaintiff to its proofs.

347. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

348. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

349. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred forty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

350. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty of the Complaint and therefore leaves Plaintiff to its proofs.

351. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-one of the Complaint and therefore leaves Plaintiff to its proofs.

352. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-two of the Complaint and therefore leaves Plaintiff to its proofs.

353. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-three of the Complaint and therefore leaves Plaintiff to its proofs.

354. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-four of the Complaint and therefore leaves Plaintiff to its proofs.

355. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-five of the Complaint and therefore leaves Plaintiff to its proofs.

**Count IX**

356. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred fifty-six of the Complaint and therefore leaves Plaintiff to its proofs.

357. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

358. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

359. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred fifty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

360. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty of the Complaint and therefore leaves Plaintiff to its proofs.

361. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-one of the Complaint and therefore leaves Plaintiff to its proofs.

362. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred sixty-two of the Complaint and therefore leaves Plaintiff to its proofs.

363. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-three of the Complaint and therefore leaves Plaintiff to its proofs.

364. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-four of the Complaint and therefore leaves Plaintiff to its proofs.

365. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-five of the Complaint and therefore leaves Plaintiff to its proofs.

366. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-six of the Complaint and therefore leaves Plaintiff to its proofs.

367. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

368. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred sixty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

369. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred sixty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

370. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy of the Complaint and therefore leaves Plaintiff to its proofs.

371. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-one of the Complaint and therefore leaves Plaintiff to its proofs.

372. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-two of the Complaint and therefore leaves Plaintiff to its proofs.

373. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-three of the Complaint and therefore leaves Plaintiff to its proofs.

374. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred seventy-four of the Complaint and therefore leaves Plaintiff to its proofs.

375. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-five of the Complaint and therefore leaves Plaintiff to its proofs.

376. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-six of the Complaint and therefore leaves Plaintiff to its proofs.

377. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-seven of the Complaint and therefore leaves Plaintiff to its proofs.

378. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-eight of the Complaint and therefore leaves Plaintiff to its proofs.

379. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred seventy-nine of the Complaint and therefore leaves Plaintiff to its proofs.



Count X

380. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty of the Complaint and therefore leaves Plaintiff to its proofs.

381. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-one of the Complaint and therefore leaves Plaintiff to its proofs.

382. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-two of the Complaint and therefore leaves Plaintiff to its proofs.

383. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-three of the Complaint and therefore leaves Plaintiff to its proofs.

384. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-four of the Complaint and therefore leaves Plaintiff to its proofs.

385. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred eighty-five of the Complaint and therefore leaves Plaintiff to its proofs.

386. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-six of the Complaint and therefore leaves Plaintiff to its proofs.

387. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-seven of the Complaint and therefore leaves Plaintiff to its proofs.

388. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-eight of the Complaint and therefore leaves Plaintiff to its proofs.

389. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred eighty-nine of the Complaint and therefore leaves Plaintiff to its proofs.

390. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety of the Complaint and therefore leaves Plaintiff to its proofs.

391. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred ninety-one of the Complaint and therefore leaves Plaintiff to its proofs.

392. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-two of the Complaint and therefore leaves Plaintiff to its proofs.

393. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-three of the Complaint and therefore leaves Plaintiff to its proofs.

394. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-four of the Complaint and therefore leaves Plaintiff to its proofs.

395. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-five of the Complaint and therefore leaves Plaintiff to its proofs.

396. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-six of the Complaint and therefore leaves Plaintiff to its proofs.

397. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three

hundred ninety-seven of the Complaint and therefore leaves Plaintiff to its proofs.

398. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-eight of the Complaint and therefore leaves Plaintiff to its proofs.

399. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph three hundred ninety-nine of the Complaint and therefore leaves Plaintiff to its proofs.

400. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred of the Complaint and therefore leaves Plaintiff to its proofs.

401. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred one of the Complaint and therefore leaves Plaintiff to its proofs.

402. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred two of the Complaint and therefore leaves Plaintiff to its proofs.

403. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four

hundred three of the Complaint and therefore leaves Plaintiff to its proofs.

404. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred four of the Complaint and therefore leaves Plaintiff to its proofs.

405. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred five of the Complaint and therefore leaves Plaintiff to its proofs.

406. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred six of the Complaint and therefore leaves Plaintiff to its proofs.

407. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred seven of the Complaint and therefore leaves Plaintiff to its proofs.

408. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred eight of the Complaint and therefore leaves Plaintiff to its proofs.

409. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four

hundred nine of the Complaint and therefore leaves Plaintiff to its proofs.

410. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred ten of the Complaint and therefore leaves Plaintiff to its proofs.

411. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred eleven of the Complaint and therefore leaves Plaintiff to its proofs.

412. Defendant is without sufficient information to form a belief as to the truth of the allegations in paragraph four hundred twelve of the Complaint and therefore leaves Plaintiff to its proofs.

**WHEREFORE,** Defendant John Mayer, Jr. asks this Honorable Court to dismiss this Complaint as to Defendant John Mayer, Jr. and award him costs and attorney fees so wrongfully incurred.

Date: \_\_\_\_\_

\_\_\_\_\_/s/\_\_\_\_\_  
John Mayer, Jr.

\_\_\_\_\_/s/\_\_\_\_\_  
By: Joseph F. Regnier(P19306)  
David M. Regnier(P72637)  
Attorneys for Defendant  
John Mayer, Jr.  
306 W. Main Street, Ste. 2  
Brighton, MI 48116  
(810) 225-0711

Dated: August 13, 2010

**CERTIFICATE OF SERVICE**

The undersigned stated that the following documents were served as follows:

1. Documents served: Appearance, Answer to Complaint
2. Method of Service: Efile
3. Date Served: August 13, 2010
4. Served Upon:

**MICHAEL C. O'MALLEY (P59108)**

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